

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	<b>§ Chapter 11</b> <b>§</b> <b>§ Case No. 20-33948 (MI)</b> <b>§</b> <b>§ (Jointly Administered)</b>
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**BP EXPLORATION & PRODUCTION INC.’S WITNESS AND EXHIBIT LIST**

BP Exploration & Production Inc. (“BP”) files this Witness and Exhibit List identifying those individuals that may be called as witnesses and exhibits that may be introduced at the hearing on (i) *Motion of BP Exploration & Production Inc. to Quash Debtors’ Bankruptcy Rule 2004 Discovery Requests* (the “BP’s Motion to Quash”), [Docket No. 1415] and (ii) *Shell Offshore Inc.’s Motion to Quash Debtors’ Notice of Bankruptcy Rule 2004 Request for Production of Documents from Shell Offshore Inc* [Docket No. 1412], scheduled for **August 24, 2021, at 9:00 a.m.** (prevailing Central Time) (the “Hearing”).

**A. WITNESSES**

In connection with the Hearing, BP may call any one or more of the following individuals to provide testimony:

1. Any witness necessary to authenticate a document;
2. Any witness designated or called by any other party; and
3. Any impeachment or rebuttal witness.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

**B. EXHIBITS**

In connection with the Hearing, BP may seek to introduce into evidence any one or more of the following documents:

<b>Ex. #</b>	<b>Description</b>	<b>Offered</b>	<b>Obj.</b>	<b>Admitted</b>	<b>Disposition</b>
1.	Galapagos Area Loop Subsea Production System Construction and Operating Agreement, dated December 1, 2011, as amended from time to time, (the “ <u>LSPS OA</u> ”) - <b>Exhibit B1</b> to the Motion to Quash [previously filed under seal at Docket No. 1415-2]				
2.	Dispute Resolution Procedure, which is Exhibit F to the LSPS OA – <b>Exhibit A2</b> to the <i>Motion of BP Exploration &amp; Production Inc. for Entry of an Order Pursuant to 11 U.S.C. Section 362(d) Authorizing Relief from the Automatic Stay to Commence Arbitration Against the Debtors</i> [previously filed under seal at Docket No. 1414-3]				
3.	Production Handling and Operating Services Agreement for Mississippi Canyon Block 519, dated September 21, 2010 [previously filed under seal at Docket No. 832-2]				
4.	Purchase and Sale Agreement by and between Fieldwood Energy LLC and BP Exploration and Production Inc. for Mississippi Canyon Block 519 dated May 17, 2019 (eff. May 1, 2019) [previously filed under seal at Docket No. 1607-27]				

Ex. #	Description	Offered	Obj.	Admitted	Disposition
5.	Excerpt of the Transcript from the Court's April 9, 2021 Hearing, Page 27, Lines 17-19 - <b>Exhibit B2</b> to the Motion to Quash [Docket No. 1415-3]				
6.	Excerpt of the Transcript from the Court's May 6, 2021 Hearing, Page 42, Lines 18-23 - <b>Exhibit B3</b> to the Motion to Quash [Docket No. 1415-4]				
7.	Excerpt of Deposition Transcript of Mr. Michael Dane, Page 273, Lines 2-7 - <b>Exhibit B4</b> to the Motion to Quash [Docket No. 1415-5]				
8.	Email dated May 14, 2021 from A. Perez transmitting Letter from Fieldwood Energy to BP Exploration and Production Inc.				
9.	Email dated May 14, 2021 from Paul Genender transmitting Rule 2004 Requests to BP dated May 14, 2021				
10.	Any exhibit designated by any other party				
11.	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case				
12.	Any impeachment or rebuttal exhibits				

BP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. BP also reserves the right to rely upon and use as evidence additional documents produced by the Debtors or any other party in interest.

*(Signature page follows.)*

Dated: August 20, 2021

Respectfully submitted,

**GREENBERG TRAURIG, LLP**

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– and –

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***Counsel for BP Exploration & Production Inc.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 20, 2021, a true and correct copy of the foregoing Witness and Exhibit List was served by electronic mail via the Court's ECF system to all parties authorized to receive notice in this case.

By: /s/ Shari L. Heyen  
Shari L. Heyen